



James W. Noe
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November 9, 2020

Via E-mail (speck@lawla.com)

Stewart F. Peck, Esq.
Lugenbuhl, Wheaton, Peck, Rankin &
Hubbard
601 Poydras Street
Suite 2775
New Orleans, Louisiana 70130

Re: Demand for Payment/Statement of Privilege - Mississippi Canyon 948

Dear Stewart:

As you will recall, we represent Fieldwood Energy, LLC ("Fieldwood"). We have received a copy of your letter dated October 30, 2020 addressed to Ecopetrol America LLC ("Ecopetrol") that included a demand for payment and statement of privilege arising out of alleged payments owed by Fieldwood to Atlantic Maritime Services LLC ("Atlantic") related to drilling services performed under a Master Domestic Offshore Daywork Drilling Contract ("Contract"). Atlantic has filed or purported to file various liens on Fieldwood properties and assets pursuant to the Louisiana Oil Well Lien Act (La. R.S. 9:4861 *et seq.*).

The liens filed by Atlantic are improper and constitute tortious conduct. In total, Atlantic has filed liens alleging a total amount owed of approximately \$14.1 million. Fieldwood disputes the amount owed and has numerous offsets and credits, including, without limitation, a fuel credit in the amount of approximately \$1.1 million. Additionally, as a result of numerous performance failures during the performance of the Contract, Fieldwood has incurred millions of dollars of damage that will, at a minimum, likely offset any amount owed to Atlantic. Fieldwood hereby gives you notice that it is currently evaluating how to lawfully present the claims to Atlantic in light of Atlantic's bankruptcy proceeding. Further, as you know, the Contract provides Fieldwood important audit rights related to these types of charges and Fieldwood intends to fully pursue those in the context of any amounts owed to Atlantic in the appropriate legal forum.

Please be advised that on November 6, 2020, Ecopetrol sent us the attached letter, which attaches the demand for payment and statement of privilege referenced above. Their letter states "Ecopetrol demands that Fieldwood address this matter as soon as possible and fulfill their obligations under the Gunflint JOA, since an intent to file suit against Ecopetrol is made." To the extent that Atlantic has procured Ecopetrol's demand against Fieldwood, such action would be a violation of the automatic stay.

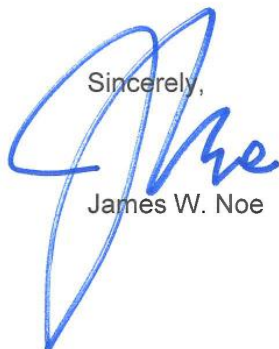
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811 Main Street, Suite 2900 | Houston, TX 77002 | T: 713.437.1800 | F: 713.437.1810 | joneswalker.com

Fieldwood will remain vigilant in protecting the estate during the bankruptcy process and reserves all rights.

This letter is written without prejudice and Fieldwood reserves all of its rights, at law and equity.

Sincerely,



James W. Noe

cc: Josh Norris, Esq. (Jones Walker LLP)
Alfredo R. Perez, Esq. (Weil, Gotshal & Manges)
Bob Kelsey (Ecopetrol America LLC)
Mike Dane (Fieldwood Energy, LLC)
Tommy Lamme (Fieldwood Energy, LLC)
John Smith (Fieldwood Energy, LLC)

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VIA E-MAIL:

November 6, 2020

Fieldwood Energy, LLC
2000 W. Sam Houston, Pkwy. S., Suite 1200
Houston, Texas 77042
Attn: Mr. John Smith

Re: Notice of Statement of Privilege Field
Mississippi Canyon Block 948
Gunflint Prospect

Dear John,

Reference is made to that certain Unit Operating Agreement dated January 1, 2013 by and between Fieldwood, Ecopetrol and Talos Energy Offshore LLC covering the Gunflint Unit for the Gunflint Prospect, as amended ("UOA").

This letter is to notify Fieldwood Energy LLC ("Fieldwood") that Ecopetrol America LLC ("Ecopetrol") has been served with attached service of process regarding a Statement of Privilege recorded by Atlantic Maritime Services, LLC ("Atlantic") against the following property:

Title of Document: Statement of Privilege
Claimant: Atlantic Maritime Services, LLC
Parishes: St. Tammany, Orleans, St. Bernard and Plaquemines
Lease: OCS-G-28030
Field: Mississippi Canyon — 948
Operator: Fieldwood Energy, LLC
Principal Amount: \$5,842,744.68

Atlantic is demanding payment of \$5,842,744.68, together with interest thereon, the cost of filing the lien and attorney's fees of 10% percent of the amount sought to be collected, and is expressing that failure to pay Atlantic \$5,842,744.68 within seven (7) days from date thereof will leave Atlantic no alternative but to file a Complaint against Ecopetrol in the United States District Court for the Eastern District for Louisiana seeking the recognition and enforcement of its privilege, i.e. its Louisiana Oil Well Lien, against Ecopetrol's interest in the above property for the aforesaid amount. Additionally, pursuant to La. Rev. Stat. 9:4871, Atlantic will seek a Writ of Sequestration, without the necessity of furnishing bond.

The service of process transmittal from our agent for service of process is dated 11/05/2020 and our General Counsel received the email from them at 12:14 am 11/06/2020.

Robert W. Kelsey, Land Manager
2800 Post Oak Blvd. Suite 4500, Houston, TX 77056
Cell (713) 870-3368

Notice of Statement of Privilege Filed
Mississippi Canyon Block 948
Gunflint Prospect

Please be reminded that Fieldwood in its capacity as Gunflint operator has the following obligation under Section 5.4 of the UOA:

“Liens and Encumbrances: the Operator shall use reasonable efforts to keep the Leases, Production Systems, facilities and other equipment and any jointly owned Hydrocarbons free from all liens and encumbrances, except those provided for in Article 6.3 (Security Rights), which might arise by reason of the operations conducted under this Agreement.”

Therefore, in accordance with the above referenced Section 5.4 of the UOA, Ecopetrol demands that Fieldwood address this matter as soon as possible and fulfill their obligations under the Gunflint JOA, since an intent to file suit against Ecopetrol is made.

Ecopetrol takes this opportunity to remind Fieldwood to timely pay all future vendor payments to ensure additional liens are not filed against MC 948.

Very truly yours,
Ecopetrol America LLC

Bob Kelsey

Robert W. Kelsey
Land Manager

cc. Talos Energy Offshore LLC
Attn: Mr. Ash Shepherd